





October 13, 2022

CARB Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted Electronically

Subject: Proposed Advanced Clean Fleets (ACF) Regulation

Dear Chair Randolph, Vice Chair Berg, and CARB Board Members:

The undersigned organizations appreciate the opportunity to comment on the California Air Resources Board's (CARB) proposed Advanced Clean Fleets (ACF) regulation. Our coalition consists of organizations that represent California's manufacturing, commercial, industrial, agricultural, transportation, construction, energy, and public agency sectors. As a coalition, we acknowledge California's continuing efforts to develop leading-edge policies to address climate change and health-based air quality mandates. We also recognize that these efforts require the adoption of regulations for "achieving the maximum technologically feasible and cost-effective" GHG emission reductions pursuant to AB 32. Regrettably, we collectively find ourselves – despite our best efforts – in a difficult position regarding the workability of the proposed ACF regulation scheduled to appear before you on October 27, 2022.

California businesses, industries, our employees and the local communities that we serve are in need of your intervention. The proposal that will come before you in October is in need of significant change. Throughout the entirety of the rulemaking process, California's private and public sector stakeholders have continually raised critical implementation issues that have been cast aside.

These concerns include vehicle availability (at scale) and supply chain issues that intensify affordability concerns, the necessity to incorporate workable emergency response exemptions, obvious infrastructure readiness questions, regulatory timing and process concerns (including transparency for determining 'commercially available' vehicles), and the need for flexible low-carbon fuel alternatives, amongst others. Since these issues have not been resolved, we are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods and services to Californians.

The COVID-19 pandemic, the supply chain crisis and inflation challenges are making it difficult for Californians. There is a great deal of financial uncertainty that exists for California, and it is harmful to further sow uncertainty and potential hardship. CARB needs its stakeholders to be successful and would make great strides by directing staff to work with us, in earnest, to develop workable, affordable, and timely solutions to this major regulatory effort before it is finalized next year.

Respectfully,

CALIFORNIA MANUFACTURERS & TECHNOLOGY ASSOCIATION

101MFG, LLC.

ALMOND ALLIANCE OF CALIFORNIA

AMERICAN FOUNDRY SOCIETY

ASSOCIATED GENERAL CONTRACTORS – SAN DIEGO CHAPTER

ASSOCIATION OF CALIFORNIA EGG FARMERS

ASSOCIATION OF CALIFORNIA RECYCLING INDUSTRIES

AUTOCARE ASSOCIATION

CALIFORNIA ADVANCED BIOFUELS ALLIANCE

CALIFORNIA AGRICULTURAL AIRCRAFT ASSOCIATION

CALIFORNIA APPLE COMMISSION

CALIFORNIA AUTOMOTIVE WHOLESALERS' ASSOCIATION (CAWA)

CALIFORNIA BLUEBERRY ASSOCIATION

CALIFORNIA BLUEBERRY COMMISSION

CALIFORNIA BUSINESS PROPERTIES ASSOCIATION

CALIFORNIA BUSINESS ROUNDTABLE

CALIFORNIA CHAMBER OF COMMERCE

CALIFORNIA CITRUS MUTUAL

CALIFORNIA COMPOST COALITION

CALIFORNIA COTTON GINNERS AND GROWERS ASSOCIATION

CALIFORNIA FARM BUREAU

CALIFORNIA FOOD PRODUCERS

CALIFORNIA FRESH FRUIT ASSOCIATION

CALIFORNIA FUELS & CONVENIENCE ALLIANCE

CALIFORNIA GRAIN & FEED ASSOCIATION

CALIFORNIA GROCERS ASSOCIATION

CALIFORNIA INDEPENDENT PETROLUUM ASSOCIATION

CALIFORNIA METALS COALITION

CALIFORNIA NATURAL GAS VEHICLE COALITION

CALIFORNIA RICE COMMISSION

CALIFORNIA RAILROADS

CALIFORNIA RETAILERS ASSOCIATION

CALIFORNIA SEED ASSOCIATION

CALIFORNIA STRAWBERRY COMMISSION

CALIFORNIA TOW TRUCK ASSOCIATION

CALIFORNIA WAREHOUSE ASSOCIATION

CLEAN ENERGY

CLEAN FLEETS.NET

COUNCIL OF BUSINESS & INDUSTRIES OF WEST CONTRA COSTA COUNTY

EMERGENCY ROAD SERVICE COALITION OF AMERICA

FAMILY BUSINESS ASSOCIATION OF CALIFORNIA

FAR WEST EQUIPMENT DEALERS ASSOCIATION

FASHION ACCESSORIES SHIPPERS ASSOCIATION

FASHION JEWELRY & ACCESSORIES TRADE ASSOCIATION

FUTUREREPORTS

GEMINI SHIPPERS GROUP

GREEN COFFEE ASSOCIATION, INC.

HEXAGON AGILITY

INDUSTRIAL ENVIRONMENTAL ASSOCIATION

INLAND EMPIRE ECONOMIC PARTNERSHIP
LONG BEACH AREA CHAMBER OF COMMERCE
LOS ANGELES AREA CHAMBER OF COMMERCE
MANUFACTURERS COUNCIL OF THE CENTRAL VALLEY
NATIONAL HAY ASSOCIATION
THE NATIONAL STAR ROUTE MAIL CONTRACTORS ASSOCIATION
NATURAL GAS VEHICLES FOR AMERICA
OLIVE GROWERS COUNCIL OF CALIFORNIA
RESOURCE RECOVERY COALITION OF CALIFORNIA
SAN JOAQUIN VALLEY MANUFACTURING ALLIANCE
TRILLIUM
U.S. FORAGE EXPORT COUNCIL
WESTERN AGRICULTURAL PROCESSORS ASSOCIATION
WESTERN GROWERS ASSOCIATION
WESTERN INDEPENDENT REFINERS ASSOCIATION
WESTERN PLANT HEALTH ASSOCIATION
WESTERN PROPANE GAS ASSOCIATION
WESTERN STATES PETROLEUM ASSOCIATION
WESTERN STATES TRUCKING ASSOCIATION